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Attorneys for Defendant
PANASONIC CORPORATION OF NORTH AMERICA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NATHAN MUCHNICK, INC., on behalf of itself
and all others similarly situated,

Plaintiff,

v.

CHUNGHWA PICTURE TUBES, LTD.;
TATUNG COMPANY OF AMERICA, INC.;

Case No. CV 07 5981-MEJ

**STIPULATION RE EXTENSION OF
TIME FOR DEFENDANT TO
ANSWER, MOVE, OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT**

1 LG ELECTRONICS INC; LG PHILIPS
2 DISPLAY USA, INC.; MATSUSHITA
3 ELECTRIC INDUSTRIAL CO., LTD.;
4 PANASONIC CORPORATION OF NORTH
5 AMERICA; KONINKLIJKE PHILIPS
6 ELECTRONICS N.V.; PHILIPS ELECTRONICS
7 NORTH AMERICA CORPORATION;
8 SAMSUNG ELECTRONICS CO., LTD.;
9 SAMSUNG ELECTRONICS AMERICA, INC.;
10 SAMSUNG SDI CO., LTD. f/k/a SAMSUNG
11 DISPLAY DEVICE CO.; TOSHIBA
12 CORPORATION TOSHIBA AMERICA
ELECTRONICS COMPONENTS INC.;
TOSHIBA AMERICA INFORMATION
SYSTEMS INC.;
MT PICTURE DISPLAY COMPANY;
MT PICTURE DISPLAY CORPORATION OF
AMERICA (New York); MT PICTURE
DISPLAY CORPORATION OF AMERICA
(Ohio); and LP DISPLAYS,

Defendants.

14 WHEREAS Plaintiff Nathan Muchnick, Inc. ("Plaintiff") filed a complaint in the
15 above-captioned case on or about November 27, 2007;

16 WHEREAS Plaintiff alleges antitrust violations by manufacturers, distributors,
17 and sellers of Cathode-Ray Tubes and products containing Cathode-Ray Tubes (collectively,
18 "CRT products");

19 WHEREAS six complaints have been filed to date in federal district courts
20 throughout the United States by plaintiffs purporting to bring class actions on behalf of direct and
21 indirect purchasers alleging antitrust violations by manufacturers, distributors, and sellers of CRT
22 products (collectively, "the CRT Cases");

23 WHEREAS, a motion is pending before the Judicial Panel on Multidistrict
24 Litigation to transfer the CRT cases to this jurisdiction for coordinated and consolidated pretrial
25 proceedings pursuant to 28 U.S.C. § 1407. A response to the motion has been filed, and the
26 parties anticipate that additional responses will be filed by plaintiffs and various defendants;

1 WHEREAS Plaintiff anticipates the possibility of Consolidated Amended
2 Complaints in the CRT Cases;

3 WHEREAS Plaintiff and Defendant Panasonic Corporation of North America
4 (“PNA”) have agreed that an orderly schedule for any response to the pleadings in the CRT Cases
5 would be more efficient for the parties and for the Court;

6 WHEREAS Plaintiff agrees that the deadline for PNA to answer, move, or
7 otherwise respond to the Complaint shall be extended until the earliest of the following dates: (1)
8 forty-five days after the filing of a Consolidated Amended Complaint in the CRT Cases; or (2)
9 forty-five days after Plaintiff provides written notice to PNA that Plaintiff does not intend to file a
10 Consolidated Amended Complaint, provided however, that in the event that PNA should agree to
11 an earlier response date in any CRT case, PNA will respond to the Complaint in the above-
12 captioned action on that earlier date;

13 WHEREAS Plaintiff further agrees that this extension is available, without further
14 stipulation with counsel for Plaintiff, to all named defendants who notify Plaintiff in writing of
15 their intention to join this Stipulation;

16 WHEREAS this Stipulation does not constitute a waiver by PNA of any defense,
17 including but not limited to the defenses of lack of personal jurisdiction, subject matter
18 jurisdiction, improper venue, sufficiency of process or service of process;

19 WHEREAS, with respect to any named defendant joining the stipulation, this
20 Stipulation does not constitute a waiver of any defense, including but not limited to the defenses
21 of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process
22 or service of process.

23 PURSUANT TO LOCAL RULE 6-1(a), PLAINTIFF AND DEFENDANT PNA,
24 BY AND THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE
25

1 AS FOLLOWS:

2 1. The deadline for PNA to answer, move, or otherwise respond to the
3 Complaint shall be extended until the earliest of the following dates: (1) forty-five days after the
4 filing of a Consolidated Amended Complaint in the CRT Cases; or (2) forty-five days after
5 Plaintiff provides written notice to PNA that Plaintiff does not intend to file a Consolidated
6 Amended Complaint, provided however, that in the event that PNA should agree to an earlier
7 response date in any CRT case, PNA will respond to the Complaint in the above-captioned action
8 on that earlier date.
9

10 2. This extension is available, without further stipulation with counsel for
11 Plaintiff, to all named defendants who notify Plaintiff in writing of their intention to join this
12 Stipulation;
13

14 3. This Stipulation does not constitute a waiver by PNA, or any other named
15 defendant joining the Stipulation of any defense, including but not limited to the defenses of lack
16 of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or
17 service of process.
18

19 By his signature below, counsel for Panasonic Corporation attests under penalty of
20 perjury that counsel for Nathan Muchnick, Inc. concurs in the filing of this Stipulation.

21 **IT IS SO STIPULATED.**

22 DATED: December 10, 2007

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